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Attorneys for Defendant Wynn Las Vegas, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHRISTINA T., pseudonymously,

Plaintiff,

v.

BELLAGIO LLC, et al.,

Defendants.

Case No. 2:25-cv-00145-JCM-DJA

STIPULATION AND ~~PROPOSED~~
ORDER TO STAY DISCOVERY

Plaintiff Christina T. and Defendants Bellagio LLC; Desert Palace, LLC; Nevada Property
1, LLC; Flamingo Las Vegas Operating Company LLC; HRHH Hotel/Casino, LLC; BREF
HRHH LLC; Brookfield Finance LLC; Brookfield Asset Management (US), Inc.; Mandalay Bay
Resort Group LLC; MGM Grand Hotel LLC; MGM Grand Propco LLC; FP Holdings, L.P.;

1 Venetian Las Vegas Gaming, LLC;¹ and Wynn Las Vegas, LLC (collectively the “Parties”), by
2 and through their respective counsel of record, hereby agree and stipulate as follows:

3 1. On December 20, 2024, Plaintiff filed her Complaint in the Eighth Judicial District
4 Court, Clark County, Nevada. (ECF No. 1-1) (the “Complaint”).

5 2. On January 23, 2025, Wynn Las Vegas, LLC timely removed the case to this Court
6 pursuant to 28 U.S.C. §§ 1331, 1441 and 1446. (ECF No. 1).

7 3. On February 20, 2025, Defendant Venetian Las Vegas Gaming, LLC filed its
8 Motion to Dismiss the Complaint (ECF No. 21); Defendants Bellagio, LLC, Nevada Property 1
9 LLC, Mandalay Resort Group, LLC, MGM Grand Hotel, LLC, and MGM Grand Propco, LLC
10 filed their Motion to Dismiss the Complaint (ECF No. 23); Defendant FP Holdings, L.P. filed its
11 Motion to Dismiss the Complaint. (ECF No. 28); Defendants Desert Palace LLC and Flamingo
12 Las Vegas Operating Company, LLC filed their Motion to Dismiss the Complaint (ECF No. 30);
13 and Defendant Wynn Las Vegas, LLC filed its Motion to Dismiss the Complaint (ECF No. 31)
14 (together, “Defendants’ Motions to Dismiss the Complaint”).

15 4. The deadline for the Parties’ Discovery Plan and Scheduling Order is currently set
16 for April 6, 2025.

17 5. On March 20, 2025, Plaintiff filed her Consolidated Response to Defendants’
18 Motions to Dismiss and Motion for Leave to Amend Complaint Under Rule 15(A). (ECF No. 46).

19 6. On April 3, 2025, Defendant Venetian Las Vegas Gaming, LLC filed its Notice of
20 Non-Opposition to Plaintiff’s Motion for Leave to Amend, but reserved all rights to challenge the
21 claims and allegations made in the Amended Complaint. (ECF No. 47).

22 7. Also on April 3, 2025, Defendant Wynn Las Vegas, LLC filed its Notice of Non-
23 Opposition to Plaintiff’s Motion for Leave to Amend, but stated its intention to file a renewed
24 motion to dismiss should such leave be granted. (ECF No. 48).

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27 ¹ Plaintiff appears to have transposed the name of Venetian Las Vegas Gaming, LLC as Venetian Gaming Las Vegas,
28 LLC, which is a non-existent entity.

1 8. On April 4, 2025, Defendants Desert Palace LLC and Flamingo Las Vegas
2 Operating Company, LLC filed their notice of non-opposition to Plaintiff's Motion for Leave to
3 Amend, but reserved all rights to challenge the claims and allegations made in the Amended
4 Complaint. (ECF No. 49).

5 9. In the interests of judicial economy and to avoid the incurrence of unnecessary
6 attorneys' fees and costs, the Parties agree that discovery should be stayed pending the Court's
7 ruling on Defendants' Motions to Dismiss the Complaint, Plaintiff's Motion for Leave to Amend
8 her Complaint, as well as any subsequent yet-to-be-filed motions to dismiss the Amended
9 Complaint. Good cause exists for a stay of discovery here because discovery in this case involves
10 the production of records involving a Plaintiff who alleges she is a survivor of human trafficking.
11 Discovery will necessarily involve highly sensitive documents related to Plaintiff; a stay while
12 Defendants' Motions to Dismiss the Complaint, Plaintiff's Motion for Leave to Amend, and any
13 subsequent yet-to-be-filed motions to dismiss the Amended Complaint are pending will maximize
14 the protections of Plaintiff's privacy, conserve judicial resources, and avoid unnecessary costs.

15 10. To the extent that the Court's decisions on Defendants' Motions to Dismiss the
16 Complaint, Plaintiff's Motion for Leave to Amend her Complaint, and any subsequent yet-to-be-
17 filed motions to dismiss the Amended Complaint do not fully dispose of this matter, the Parties
18 agree that a discovery plan and proposed scheduling order shall be due within thirty (30) days of
19 the Court's decision on any anticipated motions to dismiss the Amended Complaint.

20 11. The Parties further discussed and intend to propose a one (1) year discovery period
21 commencing as of the date of the Court's ruling on any anticipated motions to dismiss the
22 Amended Complaint.

23 IT IS SO STIPULATED.
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Dated: April 7, 2025

Respectfully submitted,

/s/ Geoffrey C. Parker

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LLC*

The Court finds that the parties have shown good cause for their request to stay discovery. *See* Fed. R. Civ. P. 26(c); *see Schrader v. Wynn*, No. 2:19-cv-02159-JCM-BNW, 2021 WL 4810324 at *2-4 (D. Nev. Oct. 14, 2021). So, the Court GRANTS their stipulation (ECF No. 50).

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 4/8/2025

/s/ Kyle T. Orne

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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2025, a copy of the foregoing was filed using the CM/ECF system, which will effectuate service on all counsel of record.

/s/ Nicole M. Perry

Nicole M. Perry

Attorney for Defendant

Wynn Las Vegas, LLC